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Edward B. Diskant  
Partner  
ediskant@mwe.com  
+1 212 547 5754

October 11, 2024

Hon. Katherine Polk Failla  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Richard v. Combs, et al.*, Case No. 1:24-cv-6848 (KPF)  
Adjournment of November 7, 2024 Conference

Dear Judge Failla:

We represent defendant UMG Recordings, Inc. (“UMGR”) incorrectly sued in the above-captioned matter as “Universal Music Group NV” and “Interscope Geffen A&M Records.” We write on behalf of all of the defendants who have appeared in this case to date to respectfully request that the Court adjourn the conference currently scheduled for November 7, 2024. We have conferred with Plaintiff’s counsel who takes no position on this request.

We make this request for several reasons. First, there are currently several defendants who have not yet appeared in this action, and may not do so on or before November 7. Second, with respect to those defendants who have appeared, this Court has already extended answer deadlines for multiple defendants beyond the November 7 conference date. Finally, we anticipate that, in lieu of answering, multiple defendants will file pre-motion letters regarding forthcoming motions to dismiss the Complaint and that consistent with Your Honor’s individual rules, Plaintiff will then have an opportunity to file responsive letters.

As such, we respectfully request that the Court either adjourn the November 7 conference *sine die* pending the Court’s receipt and review of forth coming pre-motion letters and responses to the same, or in the alternative, reschedule the conference for a date convenient to the Court after November 21, 2024 – i.e., the latest deadline currently set for any defendant who has appeared to answer or otherwise respond to the Complaint. So doing might also permit the Court to consider setting global deadlines for briefing by the parties on multiple forthcoming motions.

There has been no other request for adjournment of this conference. As noted above, this request is made on behalf of all defendants who have appeared in this action to date, and Plaintiff has taken no position on this request.

**McDermott  
Will & Emery**

One Vanderbilt Avenue New York NY 10017-3852 Tel +1 212 547 5400 Fax +1 212 547 5444

US practice conducted through McDermott Will & Emery LLP.

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We appreciate Your Honor's consideration of this request.

Sincerely,



Edward B. Diskant

cc: All counsel of record via ECF